

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-F and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

/s/ Barbara R. Binis
Barbara R. Binis
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reedsSmith.com

/s/ Erik W. Legg
Erik W. Legg
FARRELL WHITE & LEGG
P. O. Box 6457
Huntington, WV 25772-6457
304.522.9100 (phone)
304.522.9162 (fax)
EWL@farrell3.com

Attorneys for Defendant American Medical Systems, Inc.

/s/ Jon C. Conlin

Jon C. Conlin
CORY WATSON
Suite 200
2131 Magnolia Avenue
Birmingham, AL 35205
205.328.2200 (phone)
205.324.7896 (fax)
TVMInfo@corywatson.com
Attorney for Plaintiffs on Exhibit A

/s/ Alexandra V. Boone

Alexandra V. Boone
MILLER WEISBROD
Suite 300
11551 Forest Central Drive
Dallas, TX 75243
214.987.0005 (phone)
214.987.2545 (fax)
aboone@millerweisbrod.com
Attorney for Plaintiffs on Exhibit B

/s/ Ellen A. Presby

Ellen A. Presby
NEMEROFF LAW FIRM
Suite 450
2626 Cole Avenue
Dallas, TX 75204
214.774.2258 (phone)
214.393.7897 (fax)
ellenpresby@nemerofflaw.com
Attorney for Plaintiffs on Exhibit C

/s/ Aaron Clark Johnson

Aaron Clark Johnson
SUMMERS & JOHNSON
717 Thomas Street
Weston, MO 64098
816.640.9940 (phone)
816.386.9927 (fax)
aaron@summersandjohnson.com
Attorney for Plaintiffs on Exhibit D

/s/ Howard L. Nations

Howard L. Nations
THE NATIONS LAW FIRM
Suite 208
3131 Briarpark Drive
Houston, TX 77042-3795
713.807.8400 (phone)
713.807.8423 (fax)
charles@howardnations.com
Attorney for Plaintiffs on Exhibit E

/s/ Derek H. Potts

Derek H. Potts
THE POTTS LAW FIRM
Suite 350
100 Waugh Drive
Houston, TX 77007
713.963.8881 (phone)
713.583.5388 (fax)
Email: dpotts@potts-law.com
Attorney for Plaintiffs on Exhibit F

Dated: June 3, 2016

EXHIBIT A – CORY WATSON, P.C.

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-17395	Emily K. Mitch v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – MILLER WEISBROD

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-05830	Sherry L. Boudro v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-CV-25655	Karen D. White v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – NEMEROFF LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-04776	Laura L. Tackett v. American Medical Systems, Inc., Ethicon, Inc., Johnson & Johnson

EXHIBIT D – SUMMERS & JOHNSON PC

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-16167	Sharlene Stapelman, Ronald Stapelman v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT E – THE NATIONS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-09527	Joyce Eileen Sayre, David J. Cardinal v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-18904	Deborah Lynn Young v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – THE POTTS LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-14115	Susan Penegor, Bruce Charles Penegor v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis